



NATIONAL AUTOMOBILE DEALERS ASSOCIATION  
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**Legal & Regulatory Group**

August 26, 2003

**VIA ELECTRONIC MAIL**

EPA Docket Center  
Environmental Protection Agency (EPA)  
Air and Radiation Docket  
Mail Code 6102T  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Re: Agency Information Collection Activities(ICR): Proposed  
Collection; Comment Request; EPA's Mobile Air Conditioner  
(MAC) Retrofitting Program; Docket No. OAR-2003-0097

Ladies and Gentlemen:

The National Automobile Dealers Association (NADA) represents 20,000 franchised automobile and truck dealers who sell new and used motor vehicles and engage in service, repair and parts sales. Together they employ in excess of 1,250,000 people nationwide, yet approximately 50% are small businesses as defined by the Small Business Administration.

Earlier this Summer, EPA requested comment on an proposed ICR for the Agency's MAC Retrofitting Program. 68 Fed. Reg. 38322-3 (June 27, 2003). In response, NADA offers the following comments and suggestions.

EPA has approved over a dozen alternative refrigerants for use in MACs. As a practical matter, CFC-12 continues to be available to service and repair the MAC systems of older cars, trucks, and buses. This is somewhat surprising given the dire predictions of shortages made back in the early 1990's when manufacturers ceased to use CFC-12 in MACs and when the legal production and importation of CFC-12 came to a halt. Where retrofits are being done, HFC-134a appears to be the refrigerant of choice, at least with franchised automobile and truck dealerships.

When MACs are retrofitted from CFC-12 systems to ones that use HFC-134a (or another approved alternative), they must be labeled with information designed to alert technicians working on them in the future that a retrofit was done using an alternative refrigerant. The labeling requirement is designed to help avoid potential cross-contamination that might lead to problems for MACs or for refrigerant recycling equipment. Typically, labels are provided with refrigerant retrofit kits.

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Several clarifications are needed in the final ICR. First, all vehicle types (including trucks and buses) should be accounted for to determine the number of MACs currently using CFC-12. Second, actual current registration data and a remaining useful life versus a useful life calculation applied to sales data should be used to calculate the number of MACs currently on the road. Third, the 9% future retrofit projection calculation should be explained. Fourth, some number of retrofits should be subtracted from the projected total to account for potential noncompliance with the labeling requirement. Lastly, the actual data used to determine the cost for label design, typesetting, printing and distribution costs should be detailed.

On behalf of NADA, I thank EPA for the opportunity to comment on this matter.

Respectfully submitted,

A handwritten signature in black ink, reading "Douglas I. Greenhaus". The signature is written in a cursive, flowing style.

Douglas I. Greenhaus  
Director, Environment Health and Safety